



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
OREGON OPERATIONS OFFICE  
805 SW Broadway, Suite 500  
Portland, Oregon 97205

March 19, 2015

Mr. Dan Hafley  
Oregon Department of Environmental Quality  
2020 SW 4<sup>th</sup> Avenue, Suite 400  
Portland, Oregon 97201

Dear Mr. Hafley:

The Environmental Protection Agency has completed a review of the Response to Comments on the Removal Action Engineering Design Report and Removal Action Drawings and Specifications for the Willamette Cove Upland Facility. For your consideration and use, we have enclosed a few final review comments prepared by the EPA's contractor, CDM Smith. The Willamette Cove area has been identified as a key area for the EPA's in-water efforts at the Portland Harbor Superfund Site.

EPA and CDM Smith are available to meet with you at your convenience to discuss any of these review comments. Please feel free to contact me at (503) 326-6554 or [muza.richard@epa.gov](mailto:muza.richard@epa.gov) with any questions that you might have on the EPA's review of these RTCs for Willamette Cove Upland Facility.

Sincerely,

A handwritten signature in black ink, which appears to read "Rich Muza".

Rich Muza  
Remedial Project Manager

Enclosures

**Comments on the Revised Removal Design  
Willamette Cove Upland Facility  
February 27, 2015**

Please note that the comments are limited to the response to EPA comments on the October 2014 design documents; the comments below are arranged following the comment numbers in the response to comments.

**General Comments**

1. The Revised Removal Action Engineering Design Report (Revised EDR) clarifies why only a portion of the hot spot removal is being implemented and the rest of the removal is deferred pending completion of the feasibility study, source control evaluation, and in-water remedy selection. However, the report does not address how deferring portions of the preferred alternative, including cap construction and access restrictions, will affect short term risks associated with partial excavation of the hot spot soil and leaving residual exposed hot spot soil in place. Measures should be taken to limit potential for exposure to hot spot soil during the period between completion of the removal action and implementation of the final remedy.
4. There are a numerous areas where hot spots extend to the north property boundary or to the edge of the river and existing data does not define the extent of contamination beyond these boundaries. As stated in previous comments by EPA, sidewall confirmation samples should be collected at the property boundary and final riverward excavation wall to note if contamination extends beyond these excavation limits.
6. Post excavation grading will result in the ground surface sloping away from the residual hot spot areas into excavated areas and will not prevent erosion of soil into the newly excavated areas. As stated in previous comments by EPA, potential recontamination of the excavated areas during the period between completion of the removal action and implementation of the final remedy is an issue that needs to be addressed. Potential measures could include backfilling excavations and grading to promote drainage away from the excavated areas or resampling of the excavated areas prior to the final remedy.

**Specific Comments – Drawing Set**

2. Drawing sheet G-1 indicates a fiber optic utility along the north property boundary on the railroad right-of-way. The proposed excavation extends to the north property boundary. It is recommended that the design address how this line will be protected.